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December 29, 2021

**VIA ECF**

The Honorable Noel L. Hillman  
United States District Court, D.N.J.  
Mitchell H. Cohen Building  
4<sup>th</sup> and Cooper Streets  
Camden, New Jersey 08101

Re: Bernard v. Cosby  
21 CV 18566

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Dear Judge Hillman:

This firm represents plaintiff Lili Bernard and writes in response to defendant's second request to adjourn the deadline for filing his Answer to the Complaint. Plaintiff did not oppose defendant's prior adjournment request but opposes this one because of the inordinate delay requested by defendant without any reasonable justification for such an extended delay.

As alleged in the Complaint, this case is based on defendant Bill Cosby's sexual assault, abuse, battery, and rape of plaintiff in 1990. Plaintiff is a sexual abuse survivor who has waited a long time to be able to bring her claims in Court. There is no reason to wait another two months to respond to the Complaint and defendant has not provided the Court with grounds for a two-month adjournment. Whether the Supreme Court hears the Pennsylvania criminal case does not impact this New Jersey civil case. To the extent that defense counsel has professional commitments until January 14, 2022, these will be resolved in advance of the motion hearing date of February 7, 2022. Although plaintiff would prefer no adjournment at all given that defendant has already had this Complaint since October, defendant will have ample time to prepare and file his Complaint in advance of the February 7, 2022 hearing date, warranting no further extensions beyond that date.

Thank you for the Court's attention to, and consideration of, these matters.

Respectfully submitted,

/s/ Jordan Rutsky

cc (via ECF): Jennifer Bonjean  
Bonjean Law Group, PLLC  
Attorneys for Defendant